

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE  Plaintiff,  v.  TRANS UNION LLC CITY OF PHILADELPHIA  Defendant.	C.A. NO: 02-CV-4440
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**TRANS UNION LLC’S MOTION TO SUPPLEMENT  
RECORD WITH NEW AVAILABLE DEPOSITION  
TESTIMONY OF THIRD PARTY**

Trans Union LLC (“Trans Union”), by and through its undersigned attorneys, states as follows in support of its motion to supplement the summary judgment record with the deposition testimony of Nancy Cerbus, the Vice President of Superior Information Services, Inc., the entity which provided Trans Union with the disputed judgment, and later reinvestigated the judgment:

On Friday, October 24, 2003, plaintiff conducted the deposition of Superior’s Vice President of Data Information Services, Nancy Cerbus. Ms. Cerbus’ responses to plaintiff’s inquiries revealed information which bears directly upon Trans Union’s motion for summary judgment and weighs heavily against plaintiff’s opposition to Trans Union’s motion.

In particular, Ms. Cerbus testified that: 1) The City of Philadelphia did, in fact, furnish a tape to Superior which included a judgment against plaintiff; 2) Superior in turn furnished the information respecting the judgment against plaintiff to Trans Union; 3) the document which plaintiff sent to Trans Union with her dispute was “odd” and “ambiguous” and would not be used by Superior because Superior is required to conduct its reinvestigations with actual records, not computer terminal print-outs. The relevant testimony is attached to the proposed supplement as Exhibit “1”.

Respectfully Submitted,

SATZBERG, TRICHON,  
KOGAN & WERTHEIMER, P.C.

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